



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401

March 6, 2000

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Mr. Bruce Pluta
Technical Support Section (3HS41)
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Biological Technical Assistance Group. Site: 12th
Street Landfill/Dump Site. Document: Draft Action
Memorandum and Request for Sediment Removal,
Support 12th Street Dump Site, Wilmington
Delaware. March 2, 2000

Dear Mr. Pluta:

The U.S. Fish and Wildlife Service provides the following comments for the Biological Technical Assistance Group consideration.

The Draft Action Memorandum identifies lead levels in concentrations as high as 264,000 mg/kg in site soils, 33,500 mg/kg in creek bank soils and 19,500 mg/kg in sediment. Considering the fact that the concentrations of lead at the 12th Street site are at least an order of magnitude higher than the ecological benchmarks used in EPA Region III, and a dredge action occurred at the DuPont Newport site less than ten miles away with lead concentration as low as 700 mg/kg, we support the proposed removal action (including sediment removal) and recommend that the action be undertaken as soon as possible.

The Service appreciates the opportunity to comment on this issue. Please contact Chris Guy at (215) 814-3325 or Dan Murphy (410) 573-4521 if you have any questions.

Sincerely,

Beth L McGee

for

Robert J. Pennington
Assistant Field Supervisor
Div. of Habitat Evaluation and Protection

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cc:

DOI, Office of Environmental Policy and Compliance, Philadelphia, PA
(ATTN: Mike Chezik, Regional Environmental Officer)

NOAA, Philadelphia, PA

(ATTN: Peter Knight, Coastal Resource Coordinator)